

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Edward C. Penrose, II	:	Chapter 13
	:	No.: 20-10947-ELF
Debtor(s)	:	

RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY STEWARD FINANCIAL SERVICES

Debtor, Edward C. Penrose, II, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Steward Financial Services hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied.
6. Denied.
7. Denied. Debtor avers there is no delinquency and requests a detailed post-petition history for review.
8. Denied.
9. Denied.
10. Admitted.
11. Admitted.
12. Admitted.
13. Admitted.
14. Denied.

WHEREFORE, based on the aforementioned, Debtor respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Dated: February 9, 2022

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008

CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West
Standing Chapter 13 Trustee
Electronic Notice

Jason Brett Schwartz, Esq.
Attorney for Movant *Steward Financial Services*
Electronic Notice to jschwartz@mesterschwartz.com

Dated: February 9, 2022

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
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